

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CASE NO. 22-30500-swe7
DENNIS JAMES ROGERS II,	§	
Debtor.	§	CHAPTER 7

AREYA HOLDER AURZADA,	§	
CHAPTER 7 TRUSTEE FOR THE	§	
BANKRUPTCY ESTATE OF	§	
DENNIS JAMES ROGERS II	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 24-03028
	§	
FUNDERZ.NET, LLC,	§	
Defendant.	§	

**PLAINTIFF AREYA HOLDER AURZADA, CHAPTER 7 TRUSTEE FOR THE
BANKRUPTCY ESTATE OF DENNIS JAMES ROGERS II'S MOTION TO COMPEL
RESPONSE TO FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT FUNDERZ.NET, LLC**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Plaintiff Areya Holder Aurzada, Chapter 7 Trustee for the Bankruptcy Estate of Dennis James Rogers II ("Plaintiff"), pursuant to Federal Rules of Civil Procedure 37 as applicable to this adversary proceeding, hereby files this Motion to Compel Response to First Request for Production of Documents upon Defendant Funderz.net, LLC ("Funderz") and would show the Court as follows:

Plaintiff served its First Request for Production of Documents upon Defendant Funderz.net, LLC on July 1, 2025. A true and correct copy of the First Request for Production of Documents along with the cover letter to counsel for Funderz is attached as **Exhibit A**.

Funderz did not respond or object and the time for any response or objection has passed.

Counsel for Plaintiff has communicated with counsel for Funderz regarding the Request for Production as well as requests for deposition dates.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that this court enter an Order that objections, if any, have been waived and further ordering Funderz to produce all responsive documents, electronically and in native format when applicable, to the office of the undersigned counsel, without objection, within seven (7) days of the entry of an Order, that Plaintiff be awarded reasonable attorney fees and expenses for bringing this Motion, and for such other and further relief to which Plaintiff may be entitled.

Dated: August 14, 2025

Respectfully submitted,

By: /s/ David B. Miller

David B. Miller
Texas Bar No. 00788057
SCHNEIDER MILLER REYNOLDS, P.C.
300 N. Coit Road, Suite 1125
Richardson, Texas 75080
Telephone: (972) 479-1112
Facsimile: (972) 479-1113
and
T. Micah Dortch
Texas Bar No. 24044981
Dortch Lindstrom Livingston Law Group
2613 Dallas Parkway, Suite 220
Plano, TX 75093
Telephone: 214-252-8258
Facsimile: 888-653-3299

Special Counsel for the Trustee

CERTIFICATE OF CONFERENCE

I spoke to Turner Falk, counsel for Funderz, on at least two occasions regarding this Motion. Mr. Falk stated that his firm may be withdrawing from representation. I emailed Mr. Falk asking whether he could agree to this Motion and he has not responded as of this date. I presume that this Motion is opposed.

/s/ David B. Miller

David B. Miller

CERTIFICATE OF SERVICE

I certify that on August 14, 2025, I caused a copy of the foregoing document to be served via electronic mail to the counsel listed below:

Funderz.Net, LLC
c/o Carmen Contreras-Martinez
SAUL EWING LLP
701 Brickell Avenue, Suite 1700
Miami, FL 33131
carmen.contreras-martinez@saul.com

-and-

Turner N. Falk
SAUL EWING LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
turner.falk@saul.com

Counsel to Funderz.Net, LLC

/s/ David B. Miller

David B. Miller